

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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IN RE AIR CARGO SHIPPING SERVICES  
ANTITRUST LITIGATION  
  
MDL No. 1775

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: Master File 06-MD-1775 (JG)(VVP)  
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: THIS DOCUMENT RELATES TO:  
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: ALL ACTIONS  
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**DECLARATION OF HOLLIS L. SALZMAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF  
SETTLEMENT WITH DEFENDANTS SINGAPORE AIRLINES LIMITED AND  
SINGAPORE AIRLINES CARGO PTE LTD.**

I, HOLLIS SALZMAN, ESQ., declare as follows:

1. I am a Partner in the law firm Robins, Kaplan, Miller & Ciriši LLP. The Court has appointed me as one of four Co-Lead Counsel for Plaintiffs in this case. I am submitting this Declaration in support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants Singapore Airlines Limited and Singapore Airlines Cargo PTE Ltd. I have personal knowledge of the information set forth in this Declaration.

2. Co-Lead Counsel and counsel for Singapore Airlines Limited and Singapore Airlines Cargo PTE Ltd. (together, "SIAC") first began discussing settlement in 2009 and 2010, but those early discussions did not lead to an agreement. Recently, the parties re-started their settlement negotiations. Over the course of several weeks, Co-Lead Counsel and counsel for SIAC participated in numerous sessions to discuss and negotiate settlement terms, including many telephone conferences. The settlement discussions and negotiations were always at arm's length and non-collusive. Both sides vigorously negotiated their respective positions on all material terms of the Settlement Agreement.

3. In connection with these settlement negotiations, Co-Lead Counsel were informed of the facts concerning liability and damages issues and the relative strengths and weaknesses of each side's litigation position. We analyzed and evaluated many contested legal and factual issues posed by the litigation so that adequate demands and accurate evaluation of SIAC's positions could be made.

4. Based upon this information, Co-Lead Counsel determined that the contemplated settlement was in the best interests of the Settlement Class. Therefore, Co-Lead Counsel and SIAC's counsel signed the agreement with an Execution Date of December 19, 2013.

5. Attached hereto as Exhibit "A" is a true copy and correct copy of the Settlement Agreement between Plaintiffs and SIAC.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of December, 2013.

New York, New York

  
HOLLIS SALZMAN